



June 24, 2016

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: WT Docket No. 15-91**

Dear Ms. Dortch:

On June 22, 2016, Cellular South, Inc. (d/b/a C Spire) VP of Wireless Network Operations, Eric Hollingsworth and the undersigned participated in a conference call with FCC Public Safety & Homeland Security Bureau Attorney Advisor James Wiley and FCC Legal Intern Stephanie Winkler. During this call, FCC staff requested information from C Spire regarding proposed changes to Wireless Emergency Alerts (WEAs).

- C Spire informed FCC staff that the company has no immediate plans or timeline for the retirement of its 2G or 3G networks and likely will not have clear visibility into those plans for at least another 5 years.
- It is unclear what impact embedded URLs in WEA messages would have on network traffic. Data traffic could increase or decrease depending upon the type of alert, the content available at the linked site, and whether the linked site encouraged or discouraged additional data consumption by an alerted user.
- While C Spire's capabilities may not be indicative of other wireless providers of similar or smaller size, it is equipped to utilize network-based techniques to support polygon-level geotargeting of alert messaging. Device-based targeting would, however, add deployment complexities that require, at a minimum, changes to relevant standards.
- While C Spire's capabilities may not be indicative of other wireless providers of similar or smaller size, it is equipped to provide Spanish-language alert messaging. Multi-lingual message distribution would, however, add complexities that require, at a minimum, changes to relevant standards.

- The timeline and feasibility for the distribution of multimedia alerts via eMBMS is uncertain given the current availability of eMBMS equipment.
- Today, C Spire logs the CMAC attributes of alert messages at its Alert Gateway and can utilize its SMS Center to determine if or when SMS delivery errors occur.
- The preservation and “opt-out” of alert messages at the device level is entirely a matter for device OEMs and mobile operating system makers to consider and implement.
- The FCC should do more to clarify the difference between “in part” and “in whole” WEA participation.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Moncrief', with a large, stylized 'y' or 'g' at the end.

Benjamin M. Moncrief  
VP, Government Relations  
C Spire

cc (via email): James Wiley, Attorney Advisor, Public Safety & Homeland Security Bureau; Stephanie Winkler, Legal Intern